

THE STATE OF SOUTH CAROLINA
In the Court of Appeals

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May 13 2025

SC Court of Appeals

APPEAL FROM LEXINGTON COUNTY
Court of Common Pleas

Honorable Debra R. McCaslin, Judge

Appellate Case Number: 2024-001479

New Vision Automotive and Quintin Blackmon.....Appellant.

v.

Chiquita E. Cain and Chasity Myers.....Respondents.

MOTION TO EXTEND TIME LIMIT FOR FILING OF INITIAL BRIEF

Pursuant to Rule 240, SCACR, Appellant requests an extension of time to allow for the preparation of the Initial Brief in this matter. Counsel for the Appellant has had family medical issues and has not had proper time to compile the initial brief. Counsel for the Appellant has a full plate with cases and is overextended due to medical issues. The Appellant would respectfully request a thirty (30) day extension to properly collate the Initial Brief.

s/ John S. Keffer
John S. Keffer, SC Bar 67910
Keffer Law Firm
10 Law Range
Sumter, South Carolina 29150
803-774-1004
Attorney for Appellant

May 13, 2025.

Other counsel of Record:

The Honorable Debra R. McCaslin
205 East Main St, STE 463
Lexington, SC 29072
dmccaslinj@sccourts.org
803-785-8444 fax
Presiding Judge

Michael Vincent Laubshire
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Attorney for Respondent

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PROOF OF SERVICE

The undersigned hereby certifies that on the date indicated below he served the Respondents with a copy of the **Notice of Motion for Extension of time for Filing of the Initial Brief** by depositing the same into the U.S. Mail addressed directly to the Respondent’s attorney of record and to the other attorneys of record in the above matter as well as by electronic mail to addresses provided:

The Honorable Debra R. McCaslin
205 East Main St, STE 463
Lexington, SC 29072
dmccaslinj@sccourts.org
803-785-8444 fax
Presiding Judge

Michael Vincent Laubshire
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Attorney for Respondents

s/ John S. Keffer

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10 Law Range
Sumter, South Carolina 29150
ATTORNEY FOR APPELLANT

May 13, 2025



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May 13, 2025

South Carolina Court of Appeals
ATTN: Jenny Abbott Kitchings
1220 Senate Street
Columbia, SC 29201
ctappfilings@sccourts.org

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SC Court of Appeals

RE: *New Vision Automotive and Quintin Blackmon vs Chiquita E. Cain and Chasity Myers*
Appellate No.: 2024-001479
Keffer No.: 2350 & 2520

Dear Ms. Kitchings,

Enclosed herewith you will please find a check # _____ in the amount of \$50.00 dollars for the filing fee of this **Motion to Extend time limit for filing of Initial Brief**. Also enclosed herewith you will find proof of Service on related parties is enclosed.

Upon receipt of this letter if you have any questions or concerns, please do not hesitate to contact my office.

With kindest regards, I am

Sincerely yours,



JOHN S. KEFFER

JSK/flp

Enclosure

Cc: Michael Laubshire
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803-708-4888 fax
Attorney for Respondent

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